

Technical Points to be Considered
in Connection With RAW's Submission

I. Puff Parameter Analyzer

- A. RAW has not been able to attack the basic structure, mechanism, and concept of the PPA. While the Boston demonstration ostensibly was set up to permit Professor Kamm to comment on the apparatus, RAW has pointedly not chosen to share his evaluation of the PPA with the Commission.

- B. RAW's rather desperate attempts to concoct some criticism of the PPA are worthless.

1. RAW engages in colored speculation as to the possibility that Philip Morris employees might have been able to and might have wanted to subvert the results of PPA testing. In fact, the PPA has been used to evaluate Barclay with a great variety of persons, virtually all of whom have demonstrated Barclay's duplicitous character. In Boston, these persons included RAW representatives, and PPG staff members.

2. RAW contends that any experiment based upon laboratory smoking is worthless because of the artificiality of the environment. RAW makes this argument despite the fact that it relies in its response to R.J. Reynolds upon a series of experiments conducted in Professor Kamm's laboratory with smokers hooked up to a water-filled latex test bulb, a pressure transducer, a signal conditioner, a low-noise amplifier, and an oscilloscope. Smokers may smoke more rapidly, more deeply, more thoughtfully, or more completely in a laboratory, but

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it is preposterous to suppose that a smoker's lips will fit around a cigarette any differently in a laboratory than in his home.

3. B&W contends that the PPA is designed to preclude smokers from covering the ventilation perforations with their fingers. Apparently, B&W is suggesting that Barclay may indeed be a fraud, but that other cigarettes may be frauds as well. B&W presents no substantial evidence whatever to support the idea that hole blockage occurs any substantial number of times. It might be noted, though, that if B&W really believes in hole blockage, then the design of Barclay becomes understandable: in contrast to cigarettes with porous plug wrap and a multitude of ventilation perforations, Barclay is designed so that blocking (a few) holes would radically alter the cigarette. *from*

III. Swirling Smoke

- A. B&W has no response to Philip Morris' demonstration that the design of the Barclay filter is utterly unnecessary to create swirling smoke. It suggests in a footnote that the design of Barclay is not really intended to create swirling smoke, but something else that B&W is not able to identify, but the text of B&W's submission still refers to swirling smoke and spatial summation.

III. Nutt Studies

- A. B&W now apparently concedes that the methodology it advanced the first time around is wholly inadequate and misleading.

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- B. B&W's suggestion that smokers take larger or more frequent puffs is pure speculation. More important, the size and frequency of puffs are of little consequence in a butt study, because increased puff size or frequency will affect retained and delivered nicotine similarly, and will therefore not affect relative results. In contrast, increased smoke velocity will reduce retained nicotine and increase delivered nicotine. Therefore, as Philip Morris demonstrated, smoke velocity must be measured to obtain reliable results.

IV. Cotinine

- A. Gori's study assumed its conclusion by selectively testing only habitual smokers of one milligram cigarettes. Gori concedes that a smoker forced to shift to a cigarette of a very different delivery will adjust his smoking habits to minimize the change in blood cotinine levels. That is exactly what happened when smokers of one milligram cigarettes were forced to switch to Barclay, a nine or ten milligram cigarette. The results were exactly what one would expect: a substantial increase in blood cotinine levels, substantially greater than the difference between the nicotine deliveries of Barclay and one milligram cigarettes by FTC method, although concededly less than the real difference in nicotine delivery under identical smoking conditions.
- B. The mathematical model of Darby and McNamee says absolutely nothing about the validity or significance of the study conducted by Gori. It says merely that if Gori's study is valid, then a model can be created showing why it is valid which is only 50% incorrect in a majority of cases. The model in itself proves nothing, and Darby and McNamee can see as much.

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V. Philip Morris' Modified Holding Device

- A. Despite B&W's attempts to complicate the issues with reference to human smoking, the proposed Philip Morris modification is simple, straightforward, and independent of any human smoking parameter.
- B. The staining photographs included in B&W's submission are highly misleading; proper longitudinal photographs show virtually identical staining in Barclay filters smoked by smokers, and in the smoking machine with the modified holding device. In contrast, the staining pattern in filters smoked by the current FTC method is substantially different.

why no
Barclay
photos

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